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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

)	
In re:)	Chapter 11
)	
VOYAGER DIGITAL HOLDINGS, INC., <i>et al.</i> , ¹)	Case No. 22-10943 (MEW)
)	
Debtors.)	(Jointly Administered)
)	

NOTICE OF RESPONSE TO CERTAIN MEDIA STATEMENTS

PLEASE TAKE NOTICE that, on July 11, 2021, KaJ Labs published a press release indicating that it had issued a letter of intent (the “LOI”) to purchase certain assets of the above captioned debtors (the “Debtors”).

PLEASE TAKE FURTHER NOTICE that, on July 21, 2022, KaJ Labs published a press release indicating that it had rescinded the purported LOI.

PLEASE TAKE FURTHER NOTICE that the Debtors hereby file a response to KaJ Labs’ press releases, attached hereto as **Exhibit A**.

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¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Debtors’ principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

Dated: July 23, 2022
New York, New York

/s/ Joshua A. Sussberg

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Proposed Counsel to the Debtors and Debtors in Possession

Exhibit A

Response

Re: Press Releases by KaJ Labs

On July 11, 2022, KaJ Labs (“KaJ”) announced, via press release, that it issued a letter of intent (the “LOI”) to acquire the assets of Voyager Digital Holdings, Inc. (“Voyager”). The press release was published in several major news publications, including Bloomberg, Forbes, and Reorg Research.²

On July 21, 2022, KaJ announced, via press release, that it rescinded the LOI due to “disagreements regarding the deal structure and the closing process.” The press release was published in Bloomberg, Reorg Research, and several other publications.³

KaJ’s press releases are a complete fabrication. KaJ has not participated in Voyager’s marketing and sale process. KaJ did not sign a confidentiality agreement and was not given access to any confidential information. KaJ did not submit (and to date still has not submitted) an LOI to Voyager. KaJ did not engage in any conversations with Voyager’s management team or any of Voyager’s advisors regarding deal structure or the closing process and, therefore, the statement regarding “disagreements” about deal structure and the closing process are completely fabricated.

The only communication with KaJ to date are emails from a KaJ principal asking Voyager to publicly acknowledge receipt of an LOI (which, as noted above, would have been false). Voyager responded by inviting KaJ to sign a confidentiality agreement and participate in the process just like every other potential bidder. KaJ ignored Voyager’s invitation.

It is unclear what KaJ hopes to gain by the public release of false and misleading statements. But to ensure that these false statements have no impact on the fair and transparent process that Voyager and its advisors are currently engaged in, Voyager believes it is critical to correct the record. Voyager remains steadfast in its restructuring process and continues to work to drive toward a value-maximizing transaction that is beneficial to Voyager’s customers and stakeholders.

² See, e.g., <https://www.bloomberg.com/press-releases/2022-07-11/lithosphere-litho-developer-kaj-labs-announces-letter-of-intent-to-acquire-voyager-digital-assets-for-250-million>.

³ See, e.g., <https://www.bloomberg.com/press-releases/2022-07-21/kaj-labs-rescinds-250-million-loi-to-acquire-voyager-digital-s-assets>